

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

PRISM TECHNOLOGIES, LLC,

Plaintiff,

v.

ADOBE SYSTEMS INCORPORATED, et al.

Defendants.

Case No. 8:10-cv-220

JURY TRIAL DEMANDED

**DECLARATION OF MATT RODGERS
IN SUPPORT OF DEFENDANTS'
MOTION FOR ENTRY OF
PROTECTIVE ORDER**

1. I am an attorney in the Houston office of Williams, Morgan & Amerson, P.C., counsel of record for defendants McAfee, Inc. and The Mathworks, Inc. I make these statements based upon my own personal knowledge.

2. Attached as Exhibit A is a true and correct copy of Defendants' Proposed Protective Order.

3. Attached as Exhibit B is a true and correct copy of the Northern District of California sample Stipulated Protective Order For Litigation Involving Patents, Highly Sensitive Confidential Information And/Or Trade Secrets.

4. Attached as Exhibit C is a true and correct copy of the Eastern District of Texas Magistrate Judge Chad Everingham's sample Protective Order.

5. Attached as Exhibit D is a true and correct copy of the Default Standard For Access To Source Code, Judge Sue L. Robinson, United States District Court for the District of Delaware.

6. Attached as Exhibit E is a true and correct copy of the Patent Local Rules for the United States District Court Northern District of California (Revised December 1, 2009).

7. Attached as Exhibit F is a true and correct copy of Appendix M Patent Rules to the Eastern District of Texas Local Rules And Appendixes (Revised August 1, 2011).

8. Attached as Exhibit G is a true and correct copy of the Joint Motion For Entry Of Stipulated Protective Order dated August 19, 2009 from Prism Technologies v. Research in Motion, Ltd. et al; Case #: 8:08-cv-00537-LES -TDT In The United States District Court For The District Of Nebraska.

9. Attached as Exhibit H is a true and correct copy of the Agreed Protective Order Regarding The Disclosure And Use Of Discovery Materials dated February 28, 2011 from InNova Patent Licensing, LLC v. 3Com Corp. Et Al.; Civil Action No. 2:10-cv-251 in the Eastern District of Texas, Marshall Division.

10. Attached as Exhibit I is a true and correct copy of the Protective Order dated December 11, 2009 from Deep Nines, Inc. v. McAfee Inc et al.; Civil Action No. 9:09CV89 in the Eastern District of Texas, Lufkin Division.

11. Attached as Exhibit J is a true and correct copy of Prism Technologies' First Set Of Requests For Production And Inspection Of Documents And Things To Adobe Systems, Inc. dated July 22, 2011.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 4, 2011


Matt Rodgers